

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS (EASTERN DIVISION)

DIRECTV, Inc., a California corporation,

Plaintiff,

v.

JOSEPH GRYBOSKI,

Defendant

Case No. 03-12255-WGY

PLAINTIFF'S RESPONSE TO DEFENDANT, JOSEPH GRYBOSKI'S
FIRST SET OF INTERROGATORIES

INSTRUCTIONS

Plaintiff, DIRECTV, INC., by and through its undersigned counsel, pursuant to Fed R. Civ. P. 33, hereby responds to Defendant, Joseph Gryboski's First Set of Interrogatories served with effective date of service of May 10, 2004, as follows:

I. GENERAL OBJECTIONS

1. The answers to these discovery requests are based on information available to DIRECTV at this time and are made on the basis of DIRECTV's current knowledge and belief, after reasonable inquiry. There may be additional facts and/or documents affecting DIRECTV's responses of which DIRECTV is currently unaware, despite reasonable investigation and inquiry. DIRECTV reserves the right to modify its

beyond the scope of discover a bowl information pursuant to Fed R. Civ. P. 26.

RESPONSE:

Without waving said objection DIRECTV responds, other than its attorneys and staff:

Marvin C. Diwa
DIRECTV, Inc.
C/o McLaughlin Sacks, LLC
31 Trumbull Road
Northampton, MA 01060

2. INTERROGATORY

Explain and list in detail each and every piece of hardware and software Defendant is required to have in order to illegally receive DIRECTV'S satellite programming.

OBJECTION: DIRECTV objects to this request in that it is vague and ambiguous, overly broad, and not limited to information reasonably calculated to lead to the discovery of admissible evidence. For purposes of the responses to these Interrogatories, a "Pirate Access Device" is a device designed to permit viewing of DIRECTV's television programming without authorization by, or payment to, DIRECTV, and include, without limitation, illegally modified DIRECTV Access Cards, programmers, bootloaders, unloopers, emulators and software scripts. Further, when used in these responses, unless otherwise specified, the

term "Access Card" shall refer to cards utilized in conjunction with DIRECTV satellite receivers for purposes of obtaining DIRECTV programming or services, whether such Access Card is validly activated, not activated or illegitimately programmed.

RESPONSE: Subject to and without waiving this objection, DIRECTV responds as follows: There are various ways to obtain satellite transmissions without authorization. At a minimum, an individual needs a fixed outdoor satellite dish, a satellite receiver designed to receive DIRECTV's satellite signals, cabling, and a DIRECTV access card. Additionally, to view the satellite transmissions, an individual will typically use a monitor connected to the receiver. Each of these items are typically purchased or obtained from entities other than DIRECTV. Unauthorized viewing of DIRECTV's satellite signals can be accomplished using various types of pirate hardware and software used to decode DIRECTV's satellite signals for use without authorization.

3. INTERROGATORY

Describe and explain in detail the nature, function and purpose of each device as set forth in paragraph 19 of the complaint.

VERIFICATION

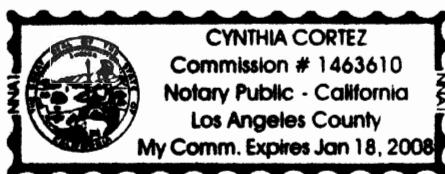
DIRECTV, INC.
By: 
Marvin C. Diwa
Its: Investigator II

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

BEFORE ME, the undersigned authority, on this day personally appeared Marvin C. Diwa, Investigator II of DIRECTV, INC., who, after having been duly sworn, stated that the above and foregoing answers to interrogatories are true and correct.

SWORN TO AND SUBSCRIBED before me by said Marvin C. Diwa on this 3rd day of May, 2004 to certify which, witness my hand and seal of office.




NOTARY PUBLIC in and for

The State of California

CYNTHIA CORTEZ
Print Name

JANUARY 18, 2008
Commission Expires